

OFFICIAL FILE

ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

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ILLINOIS  
COMMERCE COMMISSION

Implementation of the Federal Communications )  
Commission's Triennial Review Order with respect )  
to Potential Impairment Determinations Regarding ) Docket No. 03-0594  
Unbundled Local Switching for Enterprise )  
Market Customers in Specific Markets )

**PETITION FOR LEAVE TO INTERVENE**

Pursuant to the Rules of Practice of the Illinois Commerce Commission, 83 Ill. Admin.

Code Section 200.200, WorldCom, Inc. d/b/a MCI ("MCI"), on behalf of itself and on behalf of its affiliated companies, by and through its attorneys, respectfully requests that it be granted leave to intervene and be made a party in the above-captioned proceeding. In support of this Petition, MCI states as follows:

1. On September 14, 1998, WorldCom, Inc. completed its merger with MCI Communications Corporation. The merged companies were collectively as WorldCom, Inc. WorldCom is a corporation duly authorized to do business in the State of Illinois, although WorldCom and its various operating entities currently do business under the name MCI. Various Illinois operating subsidiaries of MCI are subject to the jurisdiction of the Commission. MCI has its principal Illinois offices at 205 North Michigan Avenue, Chicago, Illinois 60601, telephone number (312) 470-2121.

2. MCI WorldCom Communications, Inc. is a telecommunications carrier providing competitive interexchange telecommunications services throughout the State of Illinois, and is authorized to provide such services on an interMSA and intraMSA basis. See Orders of the Illinois Commerce Commission, Docket No. 83-0670, June 27, 1984, May 14, 1996 and September 30, 1997; see also 220 ILCS 5/13-202, 5/13-203 (1993). MCImetro ACCESS

TRANSMISSION SERVICES, INC. ("MCImetro") is certificated to provide resold and facilities-based local telecommunications services in those portions of the state served by Illinois Bell Telephone Company d/b/a Ameritech Illinois ("Ameritech"). *MCI Metro Access Transmission Services, Inc.*, Order, Illinois Commerce Commission Docket No. 94-0400, August 16, 1995; *MCImetro ACCESS TRANSMISSION SERVICES, INC.*, Order, Illinois Commerce Commission Docket No. 97-0057, March 12, 1997. In addition, other MCI subsidiaries, including MCI WorldCom Communications, Inc., f/k/a WorldCom Technologies, Inc., are certificated to provide various types of telecommunications services in Illinois. *See, e.g.*, Order, Illinois Commerce Commission Docket No. 97-0349, September 24, 1997, as amended December 3, 1997.

3. As certificated telecommunications carriers doing business in Illinois, MCI's affiliated companies may be directly and substantially affected by any determinations that the Commission may make regarding the issues in the above-captioned proceeding.

4. No other party to this proceeding can adequately represent MCI's interests.

5. MCI accepts the status of the record as it exists today and is not requesting party status for the purposes of delay.

6. To the extent practicable, MCI agrees to accept service of documents by electronic means as provided for in Section 200.1050 of the Commission's Rules.

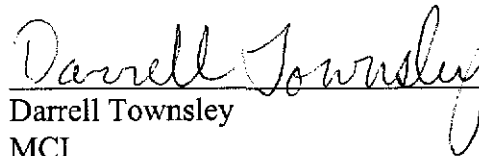
WHEREFORE, MCI respectfully requests that its Petition for Leave to Intervene be granted, and that it be made a party to this proceeding.

Respectfully submitted,

**WorldCom, Inc. d/b/a MCI**

Dated: October 6, 2003

By:

A handwritten signature in cursive script, reading "Darrell Townsley", is written over a horizontal line.

Darrell Townsley

MCI

205 North Michigan Avenue

Suite 1100

Chicago, Illinois 60601

Tel: (312) 260-3533

Fax: (312) 470-5571

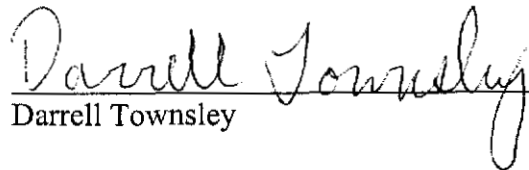
E-mail: darrell.townsley@mci.com

One of Its Attorneys

STATE OF ILLINOIS       )  
                                      )  
COUNTY OF COOK       )       SS

**VERIFICATION**

Darrell Townsley, being first duly sworn, deposes and states that he is an attorney representing WorldCom, Inc. d/b/a MCI, that he has read the Petition for Leave to Intervene of WorldCom, Inc. d/b/a MCI in Illinois Commerce Commission Docket No. 03-0594 and knows the contents thereof, and that the statements therein contained are true, to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Darrell Townsley

SUBSCRIBED AND SWORN to  
before me this 6th day of October, 2003.

  
\_\_\_\_\_  
Notary Public

My commission expires on August 9, 2005.

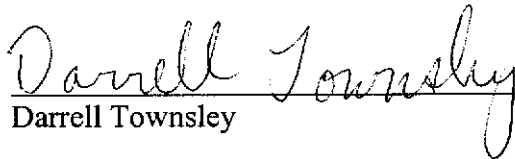


**STATE OF ILLINOIS  
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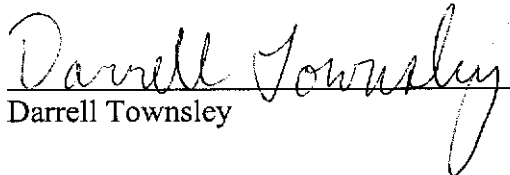
**NOTICE OF FILING**

Please take notice that on October 6, 2003, I caused to be sent by Federal Express Next Business Day Delivery, postage prepaid, the original of MCI's Petition for Leave to Intervene in the above-captioned matter to the Chief Clerk of the Illinois Commerce Commission, Elizabeth A. Rolando, 527 E. Capitol, Springfield, Illinois 62701.

  
\_\_\_\_\_  
Darrell Townsley

**CERTIFICATE OF SERVICE**

I, Darrell Townsley, certify that I caused to be served from MCI's Chicago, Illinois offices a copy of its Petition for Leave to Intervene in the above-captioned docket, together with a Notice of Filing, upon all parties on the attached service list on this 6<sup>th</sup> day of October 2003, by United States First Class Mail, postage prepaid.

  
\_\_\_\_\_  
Darrell Townsley

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**Illinois Commerce Commission  
Docket No.: 03-0594  
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